

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

AMERICAN FAMILY MUTUAL
INSURANCE COMPANY, S.I. a/s/o
COREY NIHART AND KATIE NIHART,

Plaintiff,

vs.

AMAZON.COM, INC.,

and

PECRON LLC,

Defendants.

Court File No.: 21-cv-01749-KMM-TNL

**MOTION FOR DEFAULT
JUDGMENT**

TO: Defendant Pecron, LLC

PLEASE TAKE NOTICE that, on July 6, 2022 at 10:00AM, before the above-named court, Plaintiff American Family Mutual Insurance Company, S.I., will move the Court for an order entering judgment by default against Defendant Pecron, LLC as follows:

1. Finding that the defendant, Pecron LLC (“Pecron”) manufactured an Aeiusny 400W Solar Generator Portable Power Station (“Generator”).
2. Finding that Pecron defectively designed and manufactured the Generator and is liable for the damages caused the by Generator.
3. Finding that Pectron breeched its duty to the Niharts by defectively designing and manufacturing the Generator in a manner that ultimately led to the Generator causing a fire at the home of the Niharts.
4. Determining that the damage caused by the Generator is equal to \$191,619.75 in property damage.

5. Ordering judgment against Defendant Pecron LLC and in favor of the Plaintiff for strict liability and negligence in the amount of \$191,619.75.

Dated: May 6, 2022

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